



CERTIFIED MAIL 7015 3010 0001 0805 3013
RETURN RECEIPT REQUESTED

February 7, 2019

Jim Semerad
North Dakota Department of Environmental Quality
Division of Air Quality
918 E Divide, 2nd Floor
Bismarck, ND 58501-1947

RECEIVED

FEB 12 2019

Office of Enforcement, Compliance
and Environmental Justice

LIGNITE GAS PLANT

**PERMIT T5-O80001; RENEWAL DATED APRIL 4, 2012; RENEWAL PERMIT ISSUED 1/12/2017
REVISED NSPS SUBPARTS KKK, OOOO, and OOOOa SEMIANNUAL MONITORING REPORT**

Dear Mr. Semerad:

ONEOK Rockies Midstream, L.L.C. (ORM) respectfully submits the attached revision to the New Source Performance Standards (NSPS) Leak Detection and Repair (LDAR) Subparts KKK, OOOO, and OOOOa Semiannual Monitoring Report for the Lignite Gas Plant located in Burke County, North Dakota.

This revised report is also submitted to EPA Region 8 per 40 CFR Subpart OOOO and Standard Condition 3C of the above referenced permit for monitoring conducted during the period of **July 1, 2018 through December 31, 2018**.

Previously, in a submittal dated **February 4, 2019**, ORM inadvertently submitted the semiannual LDAR report conducted by our LDAR contractor for the Lonesome Creek Facility attached to the Lignite cover letter. We have corrected that oversight with this submittal. We certainly apologize for any inconvenience this oversight may have caused.

If you have any questions, please call Teresa Merrill at (701) 339-3352 or me at (918) 591-5009.

Sincerely,

(b) (6)

W. Parke Moore
Corporate LDAR Program Manager

Attachments: **REVISED NSPS KKK, OOOO, and OOOOa LDAR Monitoring Report for Lignite Plant**

cc: **Director; Air and Toxics Technical Enforcement Program**
Office of Enforcement, Compliance and Environmental Justice

USEPA Region VIII

1595 Wynkoop Street, Mail Code 8ENF-AT
Denver, CO 80202-1129

CERTIFIED MAIL 7015 3010 0001 0805 3006, RETURN RECEIPT REQUESTED

T. Merrill / K. Rudningen / A. Hernandez / J. Handeland / C. Forsander / R. Brown (.pdf)
Tulsa Environmental Files - Lignite GP - ND\2.0 Air Files\2.3 Compliance Reporting\SAR\LDAR SAR\2019-2\SUBMITTAL

ONEOK Rockies Midstream
100 West Fifth Street
Tulsa, OK 74103
www.oneok.com

CERTIFICATION
FOR
NSPS SUBPARTS KKK, OOOO, AND OOOOa
LDAR MONITORING REPORT
JULY 1, 2018 through DECEMBER 31, 2018

Facility Name: Lignite Gas Plant

Facility Permit No.: PERMIT T5-O80001; RENEWAL DATED APRIL 4, 2012; RENEWAL PERMIT ISSUED 1/12/2017

Facility Location: Sec. 7, T192N, R91W, Burke County, ND

I certify, based on information and belief formed after reasonable inquiry, the statements and information in this document are true, accurate, and complete.

Name of Responsible Official (print or type): Craig A. Forsander

Title: Vice President – ORM Operations

Signature: _____

(b) (6)

Date: _____

February 5, 2019

**ONEOK Rockies Midstream, L.L.C.
Lignite Gas Plant**

NSPS SUBPARTS KKK, 0000, AND 0000a

LDAR MONITORING REPORT

JULY 1, 2018 through DECEMBER 31, 2018



January 11, 2019

Ms. Teresa Merrill
Environmental Specialist
ONEOK Rockies Midstream
896 25th Street SE
Sidney, MT 59270

RE: Semiannual Leak Detection and Repair (LDAR) Monitoring Report, Lignite Natural Gas Processing Facility, Burke County, North Dakota

Dear Ms. Merrill:

During July 1, 2018 through December 31, 2018, Trihydro Corporation (Trihydro) completed routine monthly monitoring for fugitive emissions as required by the LDAR program at the ONEOK Rockies Midstream Lignite (Lignite) natural gas processing facility located in Burke County, North Dakota. Monitoring activities were completed to satisfy the requirements of the New Source Performance Standard (NSPS) Subpart KKK, Subpart OOOO, and Subpart OOOOa regulations. This report serves as the documentation required for submittal to the regulatory agencies for the July through December 2018 monitoring period.

NSPS Subpart KKK, OOOO, and OOOOa Requirements

Subparts KKK, OOOO, and OOOOa require that a semiannual report be submitted for each process unit and month within the reporting period. The semiannual report must include:

- The number of valves, pressure relief devices (PRDs), pumps, compressors, and connectors (OOOO and OOOOa) for which leaks were detected.
- The number of valves, PRDs, pumps, compressors, and connectors (OOOO and OOOOa) for which leaks were not repaired as required or placed on the delay of repair (DOR) list.
- The facility is required to report the reasons for each DOR and the dates of process unit shutdowns that occurred within the reporting period.
- Revisions to the component inventory.

Results

The Lignite facility consists of two process units subject to the Subpart KKK regulation, one process unit subject to the Subpart OOOO regulation, and one process unit subject to the Subpart OOOOa regulation.



Ms. Teresa Merrill
January 11, 2019
Page 2

Trihydro personnel monitored components in volatile organic compound service and wet gas service in accordance with the United States Environmental Protection Agency Method 21 protocol.

During the July 1, 2018 through December 31, 2018 reporting period, no leaks were detected from components monitored as required by Subpart KKK and Subpart OOOO regulations. There were 5 leaks detected from components monitored as required by the Subpart OOOOa regulation. Initial repairs were completed on each component identified as leaking and 4 received passing Method 21 inspection within the 15-day deadline. Maintenance and operations personnel indicated 1 leaking component could not be repaired without a process unit shutdown. Therefore, authorization to place this component on DOR was provided by Lignite personnel. The number of valves, PRDs, pumps, compressors, and connectors for which leaks were detected during the reporting period are presented in Attachments A and B.

There were 4 components added and no components deleted from Subpart KKK and Subpart OOOO process unit inventories during the reporting period. There were no components added and 8 components deleted from the Subpart OOOOa process unit inventories during the reporting period. Revisions to the component inventory are reported in Attachment A.

No process unit shutdowns meeting the definition of §60.481 were reported by the facility during the reporting period.

If you have any questions or comments, please contact Kyle Haag at khaag@trihydro.com or Jeremy Sell at jsell@trihydro.com or by calling us at (701) 204-0065.

Sincerely,
Trihydro Corporation

(b) (6)

Kyle Haag
Project Manager

(b) (6)

Jeremy Sell
Business Unit Manager – LDAR Services

07M-041-002

Attachments

ATTACHMENT A

**EQUIPMENT LEAK REPORT,
DELAY OF REPAIR COMPONENTS, AND
REVISIONS TO THE PRIOR INVENTORY**



Semi-Annual Report

From: 7/1/2018 To: 12/31/2018, Rule: NSPS - KKK

ONEOK - Lignite

Unit:

FLARE

# Components:	Valves:	0	Pumps:	1	Compressors:	0	PRVs:	0
# Added:		0		0		0		0
# Perm. OOS:		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
July 2018	0	0	0	0	0	0	0	0
August 2018	0	0	0	0	0	0	0	0
September 2018	0	0	0	0	0	0	0	0
October 2018	0	0	0	0	0	0	0	0
November 2018	0	0	0	0	0	0	0	0
December 2018	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



Semi-Annual Report

From: 7/1/2018 To: 12/31/2018, Rule: NSPS - KKK

ONEOK - Lignite

Unit:

REFRIGERATION

# Components:	Valves:	179	Pumps:	0	Compressors:	0	PRVs:	2
# Added:		1		0		0		0
# Perm. OOS:		0		0		0		0
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
July 2018	0	0	0	0	0	0	0	0
August 2018	0	0	0	0	0	0	0	0
September 2018	0	0	0	0	0	0	0	0
October 2018	0	0	0	0	0	0	0	0
November 2018	0	0	0	0	0	0	0	0
December 2018	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



Semi-Annual Report

From: 7/1/2018 To: 12/31/2018, Rule: NSPS - 0000

ONEOK - Lignite

Unit: Y GRADE STORAGE

Count:	Valves: 91		Pumps: 2		Compressors: 0		PRVs: 2		Connectors: 341	
# Added:	1		0		0		0		2	
# Removed:	0		0		0		0		0	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2018	0	0	0	0	0	0	0	0	0	0
Aug 2018	0	0	0	0	0	0	0	0	0	0
Sep 2018	0	0	0	0	0	0	0	0	0	0
Oct 2018	0	0	0	0	0	0	0	0	0	0
Nov 2018	0	0	0	0	0	0	0	0	0	0
Dec 2018	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

No Delay of Repairs Performed.

Late Repairs:

No Late Repairs.



Semi-Annual Report

From: 7/1/2018 To: 12/31/2018, Rule: NSPS - OOOOa

ONEOK - Lignite

Unit:

INLET RECEIVING

Count:	Valves: 293		Pumps: 2		Compressors: 0		PRVs: 13		Connectors: 1529	
# Added:	0		0		0		0		0	
# Removed:	2		0		0		0		6	
Month:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:	Leaking:	Not Repaired in Repair Period:
Jul 2018	3	0	0	0	0	0	0	0	0	0
Aug 2018	0	0	0	0	0	0	0	0	0	0
Sep 2018	0	0	0	0	0	0	0	0	0	0
Oct 2018	2	1	0	0	0	0	0	0	0	0
Nov 2018	0	0	0	0	0	0	0	0	0	0
Dec 2018	0	0	0	0	0	0	0	0	0	0

Delay of Repairs:

Equipment:	Tag:	Leak Date:	Repair Date:	Type:	Reason:
NA	164813-000	10/8/2018	Not Repaired	VLV	REPAIR IS TECHNICALLY INFEASIBLE W/O A SHUTDOWN

Late Repairs:

No Late Repairs.

ATTACHMENT B
EPA CDX REPORTING TABLE

An owner or operator must include the information specified in paragraphs (c)(1) and (2) of this section in all semiannual reports in addition to the information required in §60.487a(c)(2)(i) through (vi): (1) Number of pressure relief devices for which leaks were detected as required in §60.5401a(b)(2); and (2) Number of pressure relief devices for which leaks were not repaired as required in §60.5401a(b)(3).

The asterisk (*) next to each field indicates that the corresponding field is required.

EQUIPMENT INFORMATION

Facility Record No. *	Month Identification *	Number of pressure relief devices for which leaks were detected *	Number of pressure relief devices for which leaks were not repaired *	Number of valves for which leaks were detected *	Number of valves for which leaks were not repaired *	Number of pumps for which leaks were detected *	Number of pumps for which leaks were not repaired *	Number of connectors for which leaks were detected *	Number of connectors for which leaks were not repaired *
(Select from dropdown list)	(Select from dropdown list)	(§60.5422a(c)(1))	(§60.5422a(c)(2))	(§60.487a(c)(2)(i))	(§60.487a(c)(2)(ii))	(§60.487a(c)(2)(iii))	(§60.487a(c)(2)(iv))	(§60.487a(c)(2)(vii), §60.5422a(a))	(§60.487a(c)(2)(viii), §60.5422a(a))
		e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5	e.g.: 5
1 July		0	0	3	0	0	0	0	0
1 August		0	0	0	0	0	0	0	0
1 September		0	0	0	0	0	0	0	0
1 October		0	0	2	1	0	0	0	0
1 November		0	0	0	0	0	0	0	0
1 December		0	0	0	0	0	0	0	0